

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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VICTORIA EVANOFF, as Administrator of	:	CIVIL ACTION
the ESTATE OF JOHN EVANOFF,	:	
DECEASED	:	No. 5:23-cv-03417-JFL
Plaintiff,	:	
vs.	:	
MARSH USA, LLC,	:	
THERESE PERRETTE, and	:	
JOHN DOE DEFENDANTS # 1-2	:	
Defendants.	:	

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**DEFENDANTS' MOTION *IN LIMINE* TO EXCLUDE  
ANY CLAIM, AWARD, OR EVIDENCE OF PUNITIVE DAMAGES AT TRIAL  
INCLUDING DEFENDANTS' WEALTH, SIZE, OR FINANCIAL CONDITION**

AND NOW, Defendants Marsh USA, LLC (“Marsh USA”) and Therese Perrette (together, “Defendants”), by and through their undersigned counsel, Goldberg Segalla LLP, respectfully submit the within Motion *in Limine* to Exclude Any Claim, Award, or Evidence of Punitive Damages at Trial, including Defendants’ wealth, size, or financial condition.

A Brief, Exhibits, and Proposed Order are being filed herewith and are incorporated herein by reference.

WHEREFORE, Defendants respectfully request that the Court enter Order, substantially in the form appended hereto, granting Defendants’ Motion *in Limine* to Exclude Any Claim or Evidence of Punitive Damages at Trial.

Respectfully submitted,

Dated: April 9, 2024

**GOLDBERG SEGALLA LLP**

/s/ Michael P. Luongo

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*Attorneys for Defendants  
Marsh USA, LLC and Therese Perrette*

**CERTIFICATE OF NON-CONCURRENCE**

I, Michael P. Luongo, Esq., hereby certify that I contacted counsel for Plaintiff regarding possible concurrence with Defendants' Motion *in Limine* and that Plaintiff's counsel did not concur with Defendants' Motion.

*s/ Michael Luongo*

Michael P. Luongo, Esq.

Dated: April 9, 2024

**CERTIFICATE OF SERVICE**

I, Michael P. Luongo, Esq., hereby certify that a true and correct copy of the forgoing Motion *in Limine* was served on all counsel of record via ECF on the date below.

*s/ Michael Luongo*  
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Michael P. Luongo, Esq.

Dated: April 9, 2024